

# **Private School Participation in Title II, Part A *Improving Teacher Quality***



**April 2009**



# Why serve private schools?

- Because federal programs are supported from **tax dollars** all children and teachers are eligible to access these programs.
- NCLB **requires** equitable services be provided to private school students, teachers, and other educational personnel. (Under some programs, to parents.)



# Equitable Participation

## What does this mean?

- If a program is available to the public school students, then private school students who would have attended the qualifying public school are eligible to participate in the program.
- Services should be equitable and should begin at the same time as the public school services to the qualified students.



# The key word is services

*No public funds are distributed to private schools, only services and materials.*



# Covered Programs

- Title I, Part A—Improving Basic Programs
- Title I, Part B—Reading First
- Title I, Part B—Even Start Family Literacy
- Title I, Part C—Education of Migratory Children
- **Title II, Part A—Improving Teacher Quality**
- Title II B – Math and Science Partnerships
- Title II, Part D—Enhancing Education through Technology
- Title III, Part A—ELL/Emergency Immigrant
- Title IV, Part A—Safe and Drug-Free Schools
- Title IV, Part B—21<sup>st</sup> Century Learning Centers
- Title V, Part A—Innovative Programs *(No longer funded)*.
- Carl Perkins

**NOTE:** *Titles I and VA have their own equitable provision requirements.  
All other programs are covered by the Uniform Provisions in Title IX.*

- Websites for guidance on last slide -



# Process to Participate

Private schools must submit the ***Intent to Participate*** forms by the spring deadline in order to qualify for services the following school year.



# Process to Participate *continued*

## PUBLIC SCHOOL DISTRICTS MUST:

- Review ***Intent to Participate*** forms to determine which private schools wish to participate.
- Contact private schools that indicate an intent to participate and begin consultation process in April.
- Consult with private school officials prior to submitting the federal grant application.



# Consultation

## Requirements of consultation between the public school and private schools during the design and development of the programs:

- Must be timely and meaningful.
  - Consultation must happen prior to district decisions being made to ensure the needs of the private school are considered when professional development, teacher assignments, and other decisions are being made.
- Must take place on an annual basis, and be documented by the district.
  - Public school district must complete a written affirmation form indicating the date the consultation took place between the public and private school.





# Consultation *continued*

## Requirements of Consultation (continued):

- Consultation must continue **throughout** the year, to ensure the needs of private school teachers are being met.
- Consultation is an ongoing process and can occur in many ways: phone calls, e-mails, or a site visit.



# Consultation *continued*

## Consultation must cover issues such as:

- How the needs of private school teachers will be identified
- What professional development services will be offered
- How and where the services will be provided



# Consultation *continued*

## Consultation must cover issues such as: (continued)

- The amount of funds available to serve private school students and teachers.
  - *This will allow the private schools to better plan appropriately and make careful decisions with the public school district to serve their students.*
- The size and scope of the services to be provided.
  - *Public and private school should have a written plan of services to be provided.*
- Consideration of the views of the private school officials
  - *Private school professional development may be different from that of the public school.*



# Consultation *continued*

- The district maintains administrative control over services:
  - District must communicate effectively with private school officials.
  - Both must be clear about the professional development services to be provided.
  - Services must begin at the same time that services begin in the public school.



# Consultation *continued*

## Services offered to private schools must be:

- Secular, neutral and non-ideological
- Provided independently of the private school or any religious organization
  - Private school personnel cannot be hired to provide the services.



# Complaint Process

## If Private School has a Complaint:

- If private school officials believe that
  - timely and meaningful consultation has not occurred, or
  - that the district did not give due consideration to their views
- The private school official should first contact the federal programs representative or superintendent at the school district to discuss their concerns.
- In the event the concern is not resolved, the private school has the right to file a formal written complaint with the OPI.



# Complaint Process

## **The formal written complaint should include:**

- A statement that the district, other educational agency, or in some cases OPI, has violated a requirement of a federal statute or regulation that applies to a program requiring equitable participation.
- The specific requirement alleged to have been violated.
- The facts on which the complaint is based.
- The name and address of the complainant.
- The expected resolution of the alleged violation.
- The signature of the complainant.

A complaint should be sent directly to:

The Specific OPI Program Director, Office of Public Instruction  
P. O. Box 202501, Helena, MT 59620-2501



# Title II, Part A

## Improving Teacher Quality

### What IIA services are available to private school teachers?

- Professional development for core teachers is the only Title IIA service available to private schools.
- The professional development provided must be used to measurably raise student achievement.





# **Title II, Part A**

## **Improving Teacher Quality**

### **How can private school professional development be provided?**

- Participation in scheduled professional development at the school district
- Professional development services provided to private school staff by public school staff
- Registration for a workshop or contracting a trainer

*Governed by ESEA Title IX, Uniform Provisions*



# **Title II, Part A**

## **Improving Teacher Quality**

### **How does the district determine the amount of funds required for equitable services?**

- To determine the per pupil allocation the district should divide the total amount allocated for professional development in the district by the total number of public and private school students.
- This per-pupil amount should then be multiplied by the total number of students enrolled in private schools to arrive at a total amount of funds to be designated for professional development for private school teachers participating in the program.



# **Title II, Part A**

## **Improving Teacher Quality**

### **How does the district determine the amount of funds required for equitable services?**

- Private schools are eligible for at least as many professional development services as they were eligible for in FY2002 under Class Size Reduction and Eisenhower. This is the “hold-harmless” amount.
- The private school share is the greater of the “hold-harmless” and the equitable share of professional development.

***The equitable share is calculated on the Title IIA Budget Pages of the ESEA/NCLB Consolidated application in E-Grants.***



# **Title II, Part A**

## **Improving Teacher Quality**

**If the public district wants to use the Title II, Part A funds for a different use than for professional development, must the district set aside funds to provide professional development to private school teachers?**

- Yes. Private school core teachers must be provided professional development before the public district can flex or transfer funds or use funds for class size reduction or another Title II, Part A activity.



# **Title II, Part A**

## **Improving Teacher Quality**

**Does the professional development program for private school teachers have to be the same as the professional development program for public school teachers?**

- No. Consultation and coordination are essential to ensuring high quality, sustained, intensive, and classroom-focused professional development activities.
- If the professional development needs of the private school teachers are different from those of the public school teachers, the district should develop a separate program with the private school representative .



# Title II, Part A

## Improving Teacher Quality

**May funds be used to pay stipends to private school teachers for professional development activities?**

- Yes. Funds may be used to pay for stipends for private school educators.
- The use of the funds for stipends must be reasonable and necessary.
- Stipends must be paid directly to the private school teacher, not to their school.



# **Title II, Part A**

## **Improving Teacher Quality**

**May funds be used to pay for substitutes for private school teachers for professional development activities?**

- No. Funds may be not used to pay for substitutes for private school educators.
- To provide a substitute, funds would have to be given directly to the private school and this is prohibited.



# Title VI

## Flexibility and Accountability

If a district uses the **General Transferability** provision or the **REAP-Flex** authority, they must conduct consultations with private school officials prior to making any decision regarding the transfer of funds that could affect the private school's ability to benefit from programs for which they are eligible.

**Note:** *No funds can be flexed or transferred into Title VA for the 2009-10 school year.*





# Resources

## ***Federal Resources***

- ***Title II, Part A, Improving Teacher Quality Guidance***  
<http://www.ed.gov/programs/teacherqual/guidance.pdf>
- ***Ensuring Equitable Services to Private School Children  
A Title I Resource Tool Kit***  
<http://www.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf>
- ***Title IX, Part E, Uniform Provisions – Equitable Services to  
Eligible Private School Students, Teachers, and Other  
Educational Personnel, Non-Regulatory Guidance***  
<http://www.ed.gov/policy/elsec/guid/equitableserguidance.doc>
- ***Guidance on the Rural Education Achievement Program  
(REAP)***  
<http://www.ed.gov/policy/elsec/guid/reap03guidance.doc>
- ***Federal Office of Non-Public Education***  
<http://www.ed.gov/about/offices/list/oii/nonpublic/index.html>



# Resources *continued*

## ***OPI Resources***

- ***OPI Services to Private/Nonpublic Students and Teachers***  
*<http://www.opi.mt.gov/NonPub/Index.html>*
- ***OPI Title I***  
*<http://www.opi.mt.gov/TitleI/index.html>*
- ***OPI Title II, Part A***  
*<http://www.opi.mt.gov/TitleIIPartA/index.html>*



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